

FILED 21 NOV '11 11:20 USDC-ORP

Alfred Andrew Nicholson  
Pro-Se Petitioner  
ODOC SID No. 4962637  
Deer Ridge Correctional Institution  
3920 E. Ashwood Road  
Madras, Oregon 97741

 ORIGINAL  
COPY

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
EUGENE DIVISION

ALFRED ANDREW NICHELSON,  
Petitioner,

Case No. 3:11-CV-0863TC

v.

MOTION FOR RECONSIDERATION  
FOR APPOINTMENT OF  
COUNSEL

JOE DE CAMP, Superintendent,  
Deer Ridge Correctional Institution,  
Defendant.

COMES NOW, Alfred A. Nicholson, Pro-se Plaintiff, (through a D.R.C.M. legal assistant) respectfully moves this Court for a Reconsideration for Appointment of Counsel in light of fact that the Petitioner has a learning disability and dyslexia.

- (1) As of august 6, 2011, the Petitioner has been in prison for 36-Months. This is the Maximum amount allowed by law.
- (a) This was argued at sentencing, and a memo was sent to the judge about it. This is my petition.
- (2) The Petitioner needs counsel to help file appropriate motions in this Court and form a proper strategy to prosecute this case, which including:
  - (a) To get the Petitioner sentence correlate.
  - (b) 24-Months of Post-prison Supervision run count 1 and 2, concurrent, not consecutive.

 **ORIGINAL**

(3) I currently have another case in this Court, U.S. District Court Case No. 6:11-CV-  
0406-TC, and Counsel can help me with that case as well.

Petitioner is untrained in law and must litigate against a fully trained and experienced attorney. Petitioner is clearly put at an unfair disadvantage with his disabilities.

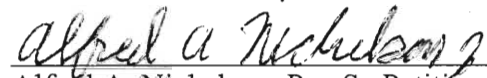
The ends of justice are best served by appointment of counsel.

### **Conclusion**

For these reasons, Plaintiff has exceptional circumstances justifying appointment of counsel.

DATED this 16<sup>th</sup> day of November, 2011.

Respectfully Submitted,

  
Alfred A. Nicholson, Pro-Se Petitioner